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December 21, 2021

VIA ECF

Hon. Gregory H. Woods
United States District Court
Daniel Patrick Moynihan United States Courthouse
Southern District of New York
500 Pearl Street, Room 2260
New York, NY 10007-1312

Re: *Flynn, et ano. v. CNN*, 1:21-Cv-02587 (S.D.N.Y., March 25, 2021)

Dear Judge Woods:

We represent Cable News Network, Inc. (“CNN”) in the above-captioned matter. On December 16, 2021, the Court granted CNN’s Motion to Dismiss (“Motion”), with leave to amend, as to Plaintiffs’ defamation claim, but denied CNN’s Motion as to Plaintiffs’ false light claim. CNN respectfully requests a fifteen-day extension of its time to move, answer, or otherwise respond to Plaintiffs’ false light claim, from December 30, 2021 to January 14, 2022. CNN requests this additional time so that CNN can respond to Plaintiff’s false light claim and to a repleaded defamation claim, if any, by single motion and/or answer. Counsel has consented to this request.

CNN has made one previous request for an extension of time, to move, answer, or otherwise respond to Plaintiffs’ first amended complaint, on May 18, 2021. Thank you for the Court’s consideration of this request.

Respectfully submitted,

Davis Wright Tremain LLP

/s/ Katherine M. Bolger

Katherine M. Bolger

cc: Counsel of Record (via ECF)

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